

EXHIBIT 15

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 BOARHEAD FARM AGREEMENT CIVIL ACTION NO.
4 GROUP, 02-CV-3830
Judge Legrome D. Davis

5 Plaintiff, ORAL DEPOSITION OF:

6 vs. MANFRED DeREWAL, JR.
(VOLUME II)

7 ADVANCED ENVIRONMENTAL TECHNOLOGY
8 CORPORATION; ASHLAND CHEMICAL
9 COMPANY; BOARHEAD CORPORATION;
10 CARPENTER TECHNOLOGY CORPORATION;
11 CROWN METRO, INC.; DIAZ CHEMICAL
12 CORPORATION; EMHART INDUSTRIES,
13 INC.; ETCHED CIRCUITS, INC.; FCG,
14 INC.; GLOBE DISPOSAL COMPANY, INC.;
15 GLOBE-WASTECH, INC.; HANDY & HARMAN
16 TUBE COMPANY, INC.; KNOLL, INC.;
17 MERIT METAL PRODUCTS CORPORATION;
18 NOVARTIS CORPORATION; NRM INVESTMENT
19 COMPANY; PLYMOUTH TUBE COMPANY;
20 QUIKLINE DESIGN AND MANUFACTURING
21 COMPANY; RAHNS SPECIALTY METALS,
22 INC.; ROHM & HAAS COMPANY, SIMON
23 WRECKING COMPANY, INC.; TECHALLOY
24 COMPANY, INC.; THOMAS & BETTS
25 CORPORATION; UNISYS CORPORATION;
UNITED STATES OF AMERICA
DEPARTMENT OF NAVY,

Defendants.

18 * * * * *
19 Tuesday, May 13, 2003
20 * * * * *

21 Transcript in the above matter taken at
22 the offices of Ballard, Spahr, Andrews & Ingersoll,
23 LLP, 1735 Market Street, 42nd Floor, Philadelphia,
24 Pennsylvania, commencing at 10:00 a.m.

Certified Shorthand Reporting Services

24 Arranged Through
25 Mastroianni & Formaroli, Inc.
709 White Horse Pike
Audubon, New Jersey 08106
(856) 546-1100

Page 406

1 A. Besides myself actually putting a hose on
2 the tanker or seen the chemicals coming out?
3 Q. Seen the chemicals that are coming out.
4 A. No.
5 Q. Are you aware of any documents, Mr. DeRewal,
6 that would show that any of the waste that was hauled
7 from the Ashland facility was disposed of at Boarhead
8 Farms?
9 A. Could there be any documents?
10 Q. Are you aware of any?
11 A. No.
12 Q. When you hauled waste for Ashland, did you
13 use a DeRewal truck and a DeRewal tanker?
14 A. Yes.
15 Q. What type of tanker did you use to haul
16 Ashland waste?
17 A. They were iron tankers, 2,700,
18 3,000 gallons. They were used Chemical Leelan tanks.
19 Q. And you might have said this earlier, I
20 really honestly don't recall. Do you know who
21 manufactures the tankers that you used for Ashland's
22 waste?
23 A. No, I don't.
24 Q. Do you recall using placards or labels on
25 the tanker or truck when you hauled waste for Ashland?

Page 407

1 MR. HARRIS: Objection.
2 THE WITNESS: No, we do not.
3 BY MR. DOTO:
4 Q. When you say "no, we do not", do you mean
5 no, you don't recall or no, you definitely did not use
6 any placards or labels?
7 A. I'm almost positive we didn't use any
8 placards or labels.
9 Q. Do you know what I'm talking about when I
10 say placards and labels?
11 A. Yes.
12 Q. Can you just tell me?
13 A. Corrosive, flammable.
14 Q. Yes.
15 A. Those type of placards.
16 Q. And to your recollection you did not use
17 them?
18 A. No.
19 Q. Was it your understanding that you were
20 supposed to use them when you hauled that waste?
21 A. Probably were, probably were.
22 Q. Did you identify anywhere on the truck or on
23 the tanker that you were hauling Ashland's waste under
24 contract with AETC?
25 A. Not that I know of.

Page 408

1 Q. Now, Mr. DeRewal, I think you testified both
2 yesterday and today, and correct me if I'm wrong, it
3 was your business practice to sign a Bill of Lading
4 when you hauled waste for a customer?
5 A. That's correct.
6 Q. And when you talked about a Bill of Lading,
7 that was basically the document that you signed when
8 you picked up the load; is that right?
9 A. That's correct.
10 Q. And did you comply with that practice when
11 you hauled waste for Ashland?
12 A. That's correct.
13 Q. Do you ever recall hauling any waste
14 products for Ashland where you didn't have to sign a
15 Bill of Lading?
16 A. Not that I can recall.
17 Q. Do you know where Marvin Jonas was
18 headquartered in the time frame been 1972 to 1978?
19 MR. HARRIS: Objection.
20 THE WITNESS: To my knowledge it would
21 have been Sewell, New Jersey.
22 BY MR. DOTO:
23 Q. Do you know if he had any acid
24 neutralization facility at that site?
25 A. I couldn't tell you.

Page 409

1 Q. But you don't recall taking any Ashland
2 acids yourself there for any acid neutralization?
3 A. No.
4 Q. Mr. DeRewal, are you aware or do you recall
5 which of the DeRewal's drivers actually hauled Ashland
6 waste other than yourself?
7 A. I would say just about every driver probably
8 pulled out of Ashland. It might have been one or two
9 maybe that didn't. The majority did it.
10 (EXHIBIT D-17, BILLS OF LADING, ASHLAND
11 CHEMICAL, IS MARKED FOR IDENTIFICATION)
12 BY MR. DOTO:
13 Q. Mr. DeRewal, I've given you what's been
14 marked D-17, and we're going to go through them, but
15 I'll represent to you that I used my best efforts to
16 pull all of the Bills of Lading for bulk transport that
17 I thought your name was possibly on.
18 There may be some that your name is possibly
19 not, and that's what we're going to talk about. So if
20 you would, take a few minutes and glance through them
21 and I'll take you through them. But I want you to be a
22 little bit familiar before I start asking you
23 questions.
24 Mr. DeRewal, you had an opportunity to look
25 through them?

65 (Pages 406 to 409)

C E R T I F I C A T E

I, Karen L. Siedlecki, a Notary Public and
Certified Shorthand Reporter of the State of New
Jersey and Commissioner of Deeds for the Commonwealth
of Pennsylvania, do hereby certify that the foregoing
is a true and accurate transcript of the testimony
as taken stenographically by and before me at the
time, place and on the date hereinbefore set
forth.

I do further certify that I am neither a
relative nor employee nor attorney nor counsel of
any of the parties to this action, and that I am
neither a relative nor employee of such attorney
or counsel and that I am not financially
interested in this action.

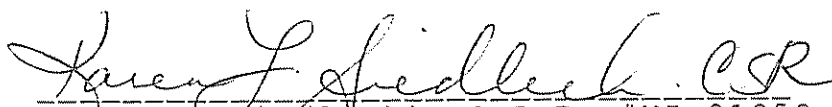

Karen L. Siedlecki, C.S.R. #XI 01958
Notary Public, State of New Jersey
Certificate No. 2162671
My Commission expires 2-17-04
Commissioner of Deeds expires 9-4-06

EXHIBIT 16

Nov-22-04 06:42am From-BALLARD SPANR

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T-103 P.02

F-100

ADVANCED ENVIRONMENTAL TECHNOLOGY CORP.

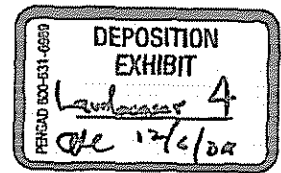
Main Offices: 97 West Hanover Avenue

Randolph, New Jersey 07801

(201) 893-2028

January 7, 1977

Mr. Don Hollwedel
Diaz Chemical Corp.
P.O. Box 194
Holley, N.Y. 14470



Dear Mr. Hollwedel,

We are pleased to quote on the extension of our services to cover a period of one year. The material which will be covered is the concentrated sulfuric and nitric acid with nitration organics (Code number assignment DC-MA-1) containing 83% H_2SO_4 , 3% HNO_3 , 10% H_2O with organics including C.N.B.T.F.

Price: One to two loads of acid a week (Sunday to Saturday) at \$.475 per gallon. \$.475 x 2900 gal. = \$1377.50. Three or more loads a week (Sunday thru Saturday) at \$.455 per gallon. \$.455 x 2900 gals. = \$1319.50. Minimum quantity per load is 2900 gals. A.E.T.C. requests 3000 gallon truck loads. Loading time is free for the first 1.5 hrs. Demurrage time is \$7.50 per 15 minutes thereafter (this charge is made at the discretion of A.E.T.C.)

Our terms are Net 10 days. Any price changes will be given 30 days prior to their effective date. A.E.T.C. requests the last right of refusal to meet the required price of any bonafide competitive quotations.

Please acknowledge your agreement to the foregoing by signing, dating and returning the enclosed copy of this letter.

R.W. Landmesser
A.E.T.C.
97 W. Hanover Ave.
Randolph, N.J. 07801

Agreed and Accepted

ADVANCED ENVIRONMENTAL TECHNOLOGY CORP.

By: Robert W. Landmesser For: Advanced Environmental Tech. Co.
Title: President Date: Jan 7, 1977

DIAZ CHEMICAL

By: Don Hollwedel For: DIAZ CHEM CORP
Title: Cy Vice President Date: FEB 2, 1977

RSA1029271

Trucking Operations • P.O. Box 152 • Milltown, New Jersey • (201) 238-0020
Hauler P.U.C. License #7011R-61

D.E.P. #N.I.B.S.W.M. 4207

EXHIBIT 17

INVOICE

No. - 1401

DeRewal Chemical Co., Inc.

P. O. BOX 64

REVERE, LUCAS COUNTY, PENNSYLVANIA 16753

Advanced Environmental Tech.
97 W. Hanover Ave.
Randolph, New Jersey 07801

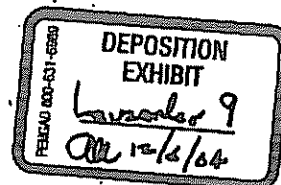
INVOICE DATE	3/31/77
OLD ORDER NO.	
YOUR ORDER NO.	
TERMS	net 10
CALLED BY	
ORDERED VIA	

DEWAL

NO. OF COPIES

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	5,600 gal loads waste water	\$.07/gal.	\$ 385.00
2	2,800 gal loads acid removed per Ashland	\$.35/gal	1960.00
1	3,000 gal load acid removed per Ashland	\$.35/gal	1050.00
2	2,900 gal loads removed per Diaz	\$.39/gal	2320.00
			\$5717.00

FORM 1400, RECEIPT FORM, PENNSYLVANIA, IN A 60103



BSAI050935